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26 *BQ RESORTS, LLC; STARPOINT RESORT GROUP, INC.;*
27 *RESORTSTAY INTERNATIONAL, LLC; GETAWAYS*
28 *RESORT MANAGEMENT, LLC; GEOHOLIDAY CLUB;*
SAPPHIRE RESORTS; JOSEPH MULDOON; CHRISTOPHER JONES

21 **UNITED STATES DISTRICT COURT**
22 **DISTRICT OF NEVADA**

24 **PAUL D.S. EDWARDS,**

25 **Plaintiff,**

26 **vs.**

Case No. 2:16-cv-01649

27 {Stipulation to Stay:1}

**MICHAEL J. MULDOON,
a/k/a MICHAEL JOSEPH
MULDOON,
a/k/a, MICHAEL J. MULDOON, III,
a/k/a, MICHAEL MULDOON,
and CHRISTOPHER JONES,
a/k/a CHRIS JONES,
and BQ RESORTS, LLC,
d/b/a STARPOINT RESORT GROUP,
INC.,
a/k/a RESORT STAY
INTERNATIONAL, LLC.,
a/d/b/a GETAWAYS RESORT
MANAGEMENT,
a/d/b/a GEOHOLIDAY CLUB,
d/b/a SAPPHIRE RESORTS, LLC,
a/d/b/a SAPPHIRE RESORTS,
GROUP,
a/k/a STAY SAPPHIRE, a/k/a
SAPPHIRE,
and DOES I-X,
and ROE CORPORATIONS XI-XX, et
al.**

Defendants.

**STIPULATION AND JOINT REQUEST OF
ALL PARTIES FOR ORDER STAYING CASE
PENDING DISPOSITION OF PLAINTIFF'S
MOTION TO REMAND [DKT. NO. 5]**

IT IS HEREBY STIPULATED BY AND BETWEEN Pro Se Plaintiff PAUL D.S. EDWARDS ("Plaintiff") and Defendants CHRISTOPHER JONES, BQ RESORTS, LLC, STARPOINT RESORT GROUP, INC., RESORT STAY INTERNATIONAL, LLC., GETAWAYS RESORT MANAGEMENT, GEOHOLIDAY CLUB, SAPPHIRE RESORTS, (collectively "Defendants") by and through their undersigned counsel, hereby submit this joint stipulation to stay discovery -, stating as follows:

1. Plaintiff commenced this action by filing a complaint against Defendants on or about June 9, 2016, in the District Court, Clark County, Nevada, Case No. A-16-738174-C.

2. Defendants removed this action on July 13, 2016 [Dkt. No. 1].

3. Plaintiff filed a Motion to Remand this case to state court on July 25, 2016 [Dkt. No 5].

4. Defendants filed an Opposition to Plaintiff's Motion to Remand on August 10, 2016 [Dkt. No. 8].

(Stipulation to Stay:1)

1 5. On September 7, 2016, the parties filed a Proposed Joint Discovery Plan and Scheduling
2 Order [Dkt. No. 13]. On page 2, lines 7-10 of the Proposed Joint Discover Plan and Scheduling Order,
3 the parties agreed and requested that "Discovery be held in abeyance until disposition of Plaintiff's
4 Motion to Remand; thereafter, should this matter remain within the jurisdiction of this Court,
5 Discovery shall be conducted as follows..."

6 6. On September 8, 2016, Magistrate Judge Cam Ferenbach signed and ordered entry of the
7 Scheduling Order pursuant to the Parties Joint Discovery Plan and Scheduling Order [Dkt. No. 14]
8 without any alterations regarding the parties request to stay discovery during the pendency of Plaintiff's
9 Motion to Remand.

10 7. Plaintiff filed his Reply to Defendants Opposition to Plaintiff's Motion to Remand on
11 October 3, 2016 [Dkt. No. 19].

12 8. That in compliance with the Parties Joint Discovery Plan [Dkt. No. 13], the Court's
13 Scheduling Order [Dkt. No. 14], and because Defendants have not yet opposed Plaintiff's Motion to
14 Compel Defendants' Further Initial Disclosures [Dkt. No. 21], Plaintiff agrees to withdraw his motion
15 to Compel [Dkt. No. 21].

16 9. Presently, the disposition of both Plaintiff's Motion to Remand as well Plaintiff's
17 Motion for Leave to File Supplemental Briefing in Support of Plaintiff's Motion to Remand [Dkt. No.
18 16] are still pending before this Court.

19 10. That any discovery propounded by Plaintiff is void and that discovery shall commence
20 anew upon the Court's determination of the Plaintiff's pending Motion to Remand as well as Plaintiff's
21 Motion for Leave to File Supplemental Briefing in Support of Plaintiff's Motion to Remand [Dkt. No.
22 16].

1 NOW THEREFORE, the parties respectfully request the Court to enter an order staying
2 discovery in this case pending disposition of Plaintiff's Motion to Remand and Plaintiff's Motion for
3 Leave to File Supplemental Briefing in Support of Plaintiff's Motion to Remand.

4 SO STIPULATED.

5 Dated: October 20, 2016

6 By: /s/ Paul D.S. Edwards
7 Paul D.S. Edwards
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12 Email: pauldse@pauldsedwards.com
13 Plaintiff, *pro se*

14 Dated: October 20, 2016

15 By: /s/ Tamar Gabriel
16 Tamar Gabriel, Esq.
17 Attorney for Defendants
18 *BQ RESORTS, LLC; STARPOINT*
19 *RESORT GROUP, INC.; RESORTSTAY*
20 *INTERNATIONAL, LLC; GETAWAYS*
21 *RESORT MANAGEMENT, LLC;*
22 *GEOHOLIDAY CLUB; SAPPHIRE*
23 *RESORTS; MICHAEL J. MULDOON*
24 *and CHRISTOPHER JONES*

25 Dated: October 20, 2016

26 By: /s/ Trevor R. Waite
27 Trevor R. Waite, Esq.
28 Attorney for Defendants
BQ RESORTS, LLC; STARPOINT
RESORT GROUP, INC.; RESORTSTAY
INTERNATIONAL, LLC; GETAWAYS
RESORT MANAGEMENT, LLC;
GEOHOLIDAY CLUB; SAPPHIRE
RESORTS; MICHAEL J. MULDOON
and CHRISTOPHER JONES

29 {Stipulation to Stay:1}

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAUL D.S. EDWARDS,

Plaintiff,

vs.

MICHAEL J. MULDOON,
a/k/a MICHAEL JOSEPH
MULDOON,
a/k/a, MICHAEL J. MULDOON, III,
a/k/a, MICHAEL MULDOON,
and CHRISTOPHER JONES,
a/k/a CHRIS JONES,
and BQ RESORTS, LLC,
d/b/a STARPOINT RESORT GROUP,
INC.,
a/k/a RESORT STAY
INTERNATIONAL, LLC.,
a/d/b/a GETAWAYS RESORT
MANAGEMENT,
a/d/b/a GEOHOLIDAY CLUB,
d/b/a SAPPHIRE RESORTS, LLC,
a/d/b/a SAPPHIRE RESORTS,
GROUP,
a/k/a STAY SAPPHIRE, a/k/a
SAPPHIRE,
and DOES I-X,
and ROE CORPORATIONS XI-XX, et
al.

Defendants.

Case No. 2:16-cv-01649

~~[PROPOSED]~~ ORDER GRANTING
STIPULATION OF ALL PARTIES FOR
ORDER TO STAY DISCOVERY.

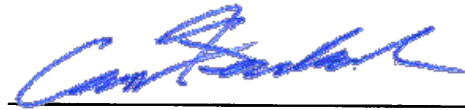
Pursuant to the Stipulation of the Parties, and in compliance with the Court's Scheduling Order
[Dkt. No. 13], and good cause appearing;

IT IS HEREBY ORDERED, ADJUDGED and DECREED that discovery is currently stayed
and will continue to be stayed until the Court rules on Plaintiff's Motion to Remand [Dkt. No. 5] and
Plaintiff's Motion for Leave to File Supplemental Briefing in Support of Plaintiff's Motion to Remand.

{00056062;1}

1 IT IS FURTHER ORDERED, ADJUDGED and DECREED that Plaintiff shall be allowed to
2 withdraw his Motion to Compel [Dkt. No. 21].

3 DONE and ORDERED this 20th day of October,
4 2016.

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6 UNITED STATES MAGISTRATE JUDGE
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